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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER APPROVING
APPLICATION PURSUANT TO 11 U.S.C.
§§ 327(a) AND 328(a) AND FED. R.
BANKR. P. 2014(a) AND 2016 FOR
AUTHORITY TO RETAIN AND EMPLOY
KPMG LLP AS INFORMATION
TECHNOLOGY, RISK, AND LEGAL
SUPPORT CONSULTANTS TO THE
DEBTORS NUNC PRO TUNC TO
PETITION DATE**

Re: Dkt. No. 2171
Date: June 11, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 PLEASE TAKE NOTICE that On May 21, 2019, the Debtors filed the *Application of Debtors*
2 *Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P. 2014(a) and 2016 for Authority to*
3 *Retain and Employ KPMG LLP as Information Technology, Risk, and Legal Support Consultants to the*
4 *Debtors Nunc Pro Tunc to Petition Date* [Dkt. No. 2171] (the “**Application**”).

5 PLEASE TAKE FURTHER NOTICE that a proposed form of order with respect to the relief
6 sought therein was attached as Exhibit A to the Application (the “**Original Proposed Order**”).

7 PLEASE TAKE FURTHER NOTICE that the hearing on the Application is scheduled to be
8 held on **June 11, 2019, at 9:30 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) at the United States
9 Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy**
10 **Court**”) in the courtroom of the Honorable Dennis Montali, United States Bankruptcy Judge,
11 Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco, California 94102. Oppositions or
12 responses, if any, to the relief requested in the Application were required to be filed and served on or
13 before June 4, 2019 at 4:00 p.m. (Pacific Time) (the “**Objection Deadline**”). The time for the Official
14 Committee of Tort Claimants to respond was extended to June 7, 2019 at 4:00 p.m. (Pacific Time).

15 PLEASE TAKE FURTHER NOTICE that, on June 4, 2019, the High Speed Rail Authority
16 and California Air Services Board (together, the “**State Agencies**”) filed an objection to the
17 Application [Dkt. No. 2384] (the “**State Agencies’ Objection**”).

18 PLEASE TAKE FURTHER NOTICE that, attached hereto as **Exhibit 1-1** and **Exhibit 1-2**,
19 respectively, are copies of the Debtors’ revised proposed order on the Application (the “**Revised**
20 **Proposed Order**”) and a redline comparison of the Revised Proposed Order against the Original
21 Proposed Order, which reflect changes made to the Original Proposed Order following discussions
22 with the State Agencies to resolve the State Agencies’ Objection. The Revised Proposed Order also
23 includes an indemnification carve-out for negligence pursuant to the Bankruptcy Court’s comments
24 related to other retention applications.

25 PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to further amend,
26 modify, or supplement the proposed order on the Application at any time up to and during the
27 Omnibus Hearing.

28 PLEASE TAKE FURTHER NOTICE that copies of the pleadings and other documents
identified herein can be viewed and/or obtained: (i) by accessing the Court’s website at
<http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

Dated: June 7, 2019

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Debtors in Possession